

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**FIRST SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO
(UPS/USPS-T2-1 through 9)**

(August 25, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Nieto (UPS/USPS-T2-1 through 9).

Respectfully submitted,



John E. McKeever
Albert P. Parker, II
Stephanie Richman
Attorneys for United Parcel Service

SCHNADER HARRISON SEGAL & LEWIS LLP
1600 Market Street, Suite 3600
Philadelphia, Pennsylvania 19103-7286
(215) 751-2200

and

1913 Eye Street, N.W., Suite 600
Washington, D.C. 20006-2106
(202) 463-2900

Of Counsel.

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UPS/USPS-T2-1. Referring to page 2 of your testimony, and Library Reference H-82 at page 4, please provide a complete description of the methodology, data collected, and results underlying the "Form 22 Density Study conducted in PQ4 of FY92" to establish density factors for different mailcodes.

- (a) Please explain why the cube-density relationships estimated by USPS witness Hatfield (USPS-T-16 at pages 12 to 14), are not applied in connection with parcel post observations in place of the linear relationship assumed.

UPS/USPS-T2-2. Referring to Library Reference H-82, Exhibit 2, page 3, please define the meaning of the terms "inbound" and "outbound" with respect to the location of the sampling test and the identification of mail sampled.

- (a) What mail is sampled at an "outbound" test? Is it the mail offloaded at the destination facility or the mail unloaded at the originating facility?
- (b) How are the sampling sites for "outbound" tests determined?
- (c) How are "inbound" vs. "outbound" tests distinguished in the TRACS databases?

UPS/USPS-T2-3. Referring to the TRACS highway expansion process described at page 4 of Library Reference H-82, please provide explicit formulas detailing each step of the process, from weight measurement of sampled pieces through expansion at the level of total highway cubic foot miles.

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UPS/USPS-T2-4. Referring to the TRACS freight rail expansion process described at page 5 of Library Reference H-82, please provide explicit formulas detailing each step of the process, from weight measurement of sampled pieces through expansion at the level of total freight rail cubic foot miles.

UPS/USPS-T2-5. Referring to the TRACS commercial air expansion process described at page 7 of Library Reference H-82, please provide explicit formulas detailing each step of the process, from weight measurement of sampled pieces through expansion at the level of all pound-miles flown on commercial air.

UPS/USPS-T2-6. Referring to the TRACS expansion process for the Eagle and Western networks described at page 8 of Library Reference H-82, please provide explicit formulas detailing each step of the process, from weight measurement of sampled pieces through expansion at the level of all network pound-miles.

UPS/USPS-T2-7. Referring to the TRACS Amtrak expansion process described at page 10 of Library Reference H-82, please provide explicit formulas detailing each step of the process, from weight measurement of sampled pieces through expansion at the level of all Amtrak movements.

UPS/USPS-T2-8. For the most recent FY 1996 accounting period, please provide all Forms 1H-Highway, 1R-Rail, 1A-Air, and 2 (surface), or their equivalent in hard copy form, from the TRACS system.

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UPS/USPS-T2-9. Please confirm that a 2400 cubic foot trailer bedloaded with parcels one foot deep would have the same TRACS Form 2 (surface) capacity utilization (100%) and expanded cubic feet assigned to parcels (2400) as the same trailer bedloaded with parcels to a height of five feet. Please explain any nonconfirmation.

- (a) If instead of bedloading, the original parcels are stacked to a height of five feet in the nose of the trailer and the trailer is 45 feet in length, please confirm that the TRACS Form 2 (surface) capacity utilization is 20 percent, but that the expanded cubic feet assigned to parcels remains at 2400.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in
accordance with section 12 of the Commission's Rules of Practice.



Albert P. Parker, II

Dated: August 25, 1997
Philadelphia, PA